

Exhibit C

[Submitting counsel below]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION**

No. 3:23-md-03084-CRB

**DECLARATION OF ROOPAL P. LUHANA
IN SUPPORT OF PLAINTIFFS' POSITION
FOR THE PARTIES' JOINT DISCOVERY
LETTER**

This Document Relates to:

All Cases

Judge: Honorable Lisa J. Cisneros
Date: TBD
Time: TBD
Courtroom: TBD

I, Roopal P. Luhana, declare and state as follows:

1. I am an attorney and partner at Chaffin Luhana LLP, counsel for Plaintiffs and Court-appointed Co-Lead Counsel in this action. I am a member in good standing of the State Bars of New York, New Jersey, Pennsylvania, and Connecticut and am admitted *pro hac vice* in this coordinated action. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.
2. I submit this Declaration in support of Plaintiffs' Position for the Parties Joint Discovery Letter as required by this Court under Pretrial Order ("PTO") No. 8 (ECF No. 323).
3. The parties met and conferred as required by PTO No. 9 (ECF No. 345) on March 27, 2024 and April 2, 2024 to discuss potential solutions to the remaining ESI disputes.
4. I was involved in the meet and confers on March 27, 2024 and April 2, 2024.
5. Attached hereto as **Exhibit A** is a true and correct copy of the Declaration of Douglas Forrest in Support of Plaintiffs' Position for the Parties Joint Discovery Letter.

